

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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**This document relates to:**

*Burnett, et al. v. Islamic Rep. of Iran, et al.*, No. 15-cv-9903 (GBD)(SN)

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT  
JUDGMENTS ON BEHALF OF NON-NATIONAL IMMEDIATE FAMILY MEMBERS  
OF NON-NATIONAL 9/11 DECEDENT THIERRY SAADA**

**(BURNETT NON-NATIONALS 6)**

PLEASE TAKE NOTICE that upon the accompanying Declaration of John M. Eubanks (“Eubanks Declaration”), with exhibits, and the accompanying memorandum of law, Plaintiffs in the *Burnett* action pending before the Court seek partial default judgment awarding Plaintiffs Jean Marc Saada, Anthony Saada, Rohy Saada, Rudy Hai Victor Saada, and Cindy Saada-Haddad (the “Saada Family Claimants”) the following:<sup>1</sup>

- (1) damages for intentional infliction of emotional distress under New York state law the Saada Family Claimants in the same per plaintiff amounts previously awarded as solatium damages by this Court to various similarly situated plaintiffs;
- (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment;
- (3) permission for the Saada Family Claimants to seek punitive damages or other damages at a later date; and

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<sup>1</sup> Another member of the Saada family, Gary Saada, was included on a prior motion filed with the Court. See ECF No. 9945.

(4) permission for all other similarly situated *Burnett* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Plaintiffs' request is made in connection with the judgment for default as to liability sought on April 30, 2024 against the Islamic Republic of Iran, the Islamic Revolutionary Guard Corps, and the Central Bank of the Islamic Republic of Iran (collectively, "the Iran Defendants") in the *Burnett* case. *See* ECF No. 9733.

Dated: June 26, 2024

Respectfully submitted,

MOTLEY RICE LLC

/s/ John M. Eubanks

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